

Subject: Re: Millberger

From: "Moreland, Edmond" <edmond@morelandlaw.com>

Date: 1/8/2014 3:50 PM

To: Gerald Drought <gdrought@mdtlaw.com>

CC: Philip Moss <pmoss@equaljusticecenter.org>

Good afternoon, Jerry.

Although Philip has received the responses to interrogatories and production requests, we have not received any responsive documents. Please go ahead and produce them. Since we are deposing the company next week, please deliver them to Philip's office as soon as possible, but no later than noon on Monday of next week.

I am still working on getting you the information regarding damages and will probably just do it by amending disclosures.

Edmond

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Subject: Re: 5:13-cv-00731-HLH Cantu et al v. Milberger Landscaping, Inc.- Discovery Responses
From: "Moreland, Edmond" <edmond@morelandlaw.com>
Date: 1/13/2014 10:55 AM
To: Gerald Drought <gdrought@mdtlaw.com>
CC: Philip Moss <pmoss@equaljusticecenter.org>, Carol Stieler <cstieler@mdtlaw.com>

Good morning, Jerry.

I write to follow up on my email to you of January 8 and Philip's email to you of the afternoon of Friday, January 10.

As we have requested in those emails, please confirm that the documents are to be delivered to Philip's office by noon today.

If they are not delivered, I will, this afternoon, have to file a Motion to Compel and request expedited consideration. The grounds for the Motion will be that (1) on December 20, 2013, we gave you all a two week extension on the bulk of discovery, (2) you indicated to me then that we would have the responses on January 6, (3) we had noticed a deposition for this Friday (January 17) on December 11 and (4) the discovery deadline is approaching.

Thank you for your attention to this matter. Should you have any questions or concerns, please do not hesitate to contact me.

Edmond

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On 1/10/2014 2:05 PM, Philip Moss wrote:

Gerry,

Please confirm that the Defendant will be producing responsive documents to Plaintiffs' discovery requests by Monday of next week. As the Defendant's responses indicate, these documents are highly relevant, not privileged, and responsive to Plaintiffs' requests. If we do not receive these documents, the Plaintiffs will have to seek the intervention of the Court.

Should you have any questions, please do not hesitate to contact me at the information

below.

Sincerely,

Philip

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Philip J. Moss | Staff Attorney | [Equal Justice Center](#)

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